

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	CRIMINAL NO. 03-_____
	:	
	:	
v.	:	DATE FILED: _____
	:	
	:	
<b>JONATHAN M. BATTLES</b>	:	<b>VIOLATIONS: 18 U.S.C. § 1343 (Fraud by wire - 8 Counts)</b>

**INFORMATION**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this Information:

1. Defendant JONATHAN M. BATTLES controlled various companies, including JMB Group, Inc., JMS Group, Inc., Daymark Resources, LLC. and Daymark International, LLC (“the defendant’s companies”).
2. Defendant JONATHAN M. BATTLES held a business checking account in the name of Daymark Resources, LLC, account # 9419313875, at Fleet Bank.
3. Defendant JONATHAN M. BATTLES held a business checking account in the name of JMB Group, Inc., account # 9419313971, at Fleet Bank.
4. Brookridge Funding Company, Winston Financial Group, Capco Financial Corporation and Contract Credit Company (“the factoring companies”) operated as factoring companies, purchasing at a discount accounts receivable from companies which had money owed

to them from their customers.

5. American International Group (“AIG”), Lehman Brothers and Marsh & McLennan were companies which did not do business with and did not owe money to defendant JONATHAN M. BATTLES and the defendant’s companies.

### **THE SCHEME**

6. From in or about January 2002, through in or about June 2002, in the Eastern District of Pennsylvania and elsewhere, defendant

### **JONATHAN M. BATTLES**

devised and intended to devise a scheme to defraud Brookridge Funding Company, Winston Financial Group, Capco Financial Corporation and Contract Credit Company and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

It was part of the scheme to defraud that:

7. Defendant JONATHAN M. BATTLES submitted to the factoring companies fictitious accounts receivable purportedly due to the defendant’s companies from AIG, Lehman Brothers and Marsh & McLennan.

8. In or about February 2002, defendant JONATHAN M. BATTLES, doing business as Daymark Resources, Inc. provided false AIG accounts receivable to Brookridge Funding Company, purporting to show that AIG owed Daymark Resources, Inc., \$265,223.51.

9. In or about February 2002, defendant JONATHAN M. BATTLES supplied Brookridge Funding Company with a fictitious telephone number for AIG, when in fact the telephone number given was assigned to BATTLES. BATTLES did this so he could verify the fictitious accounts receivables submitted to Brookridge.

10. On or about March 27, 2002, defendant JONATHAN M. BATTLES, doing

business as JMB Group, Inc, provided false AIG accounts receivable to Winston Financial Group, purporting to show that AIG owed JMB Group, Inc. 46,816.42.

11. On or about April 18, 2002, defendant JONATHAN M. BATTLES, doing business as JMB Group, Inc. provided false AIG , Lehman Brothers and Marsh & McLennan accounts receivable to Capco Financial Corp., purporting to show that AIG, Lehman Brothers and Marsh & McLennan, collectively owed JMB Group, Inc. \$ 233,500.

12. On or about April 30, 2002, BATTLES caused Capco Financial Corporation to wire \$57,180 to BATTLES' Fleet Bank account # 9419313971 to factor (purchase) four fictitious Lehman Brothers accounts receivables.

13. Defendant JONATHAN M. BATTLES, through the submission of the fictitious accounts receivables, caused Brookridge Funding Company, Winston Financial Group, Capco Financial Corporation and Contract Credit Company to be defrauded of a total of approximately \$387,007.00.

14. On or about each of the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, having devised and intending to devise the scheme, defendant

**JONATHAN M. BATTLES,**

for the purpose of executing the scheme, transmitted and caused to be transmitted by means of wire communication in interstate commerce writings, signs and signals, that is, wire transfers of funds by the victim factoring companies to bank accounts controlled by the defendant, as described below, each transmission constituting a separate count of this information:

<u>COUNT</u>	<u>DATE</u>	<u>WIRED FROM</u>	<u>FITICIOUS ACCOUNT</u>	<u>WIRED TO</u>	<u>AMOUNT</u>
1	February 11, 2002	Brookridge Funding Company, Danbury, Connecticut	AIG	Fleet Bank, Springhouse, PA, Account # 9419313875	\$51,941.31
2	February 20, 2002	Brookridge Funding Company, Danbury, Connecticut	AIG	Fleet Bank, Springhouse, PA, Account # 9419313875	\$160,217.49
3	April 12, 2002	Winston Financial Group, Santa Anna, California	AIG	Fleet Bank, Springhouse, PA, Account # 9419313971	\$46,816.42
4	April 30, 2002	Capco Financial Corporation, Coral Gables, FL	Lehman Brothers	Fleet Bank, Springhouse, PA, Account # 9419313971	\$ 57,180
5	May 8, 2002	Capco Financial Corporation, Coral Gables, FL	Marsh & McLennan	Fleet Bank, Springhouse, PA, Account # 9419313971	\$66,380
6	June 4, 2002	Capco Financial Corporation, Coral Gables, FL	AIG and Marsh & McLennan	Fleet Bank, Springhouse, PA, Account # 9419313971	\$96,380
7	June 18, 2002	Contract Credit Company, Wilmington, DE	Lehman Brothers	Commonwealth Bank, Blue Bell, PA, Account # 625-000-1325	\$13,460
8	June 25, 2002	Contract Credit Company, Wilmington, DE	Lehman Brothers	Commonwealth Bank, Blue Bell, Account # 625-000-1325	\$8,070

All in violation of Title 18, United States Code, Sections 1343.

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PATRICK L. MEEHAN  
United States Attorney